

# COHEN & GREEN

October 31, 2022

Hon. Sanket J. Bulsara, U.S.M.J.  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

By Electronic Filing.

**Re: Cunningham v. City of New York, 22-cv-00588 (LDH)(SJB)**

Dear Judge Bulsara:

I am co-counsel for Plaintiff in this case. I write — jointly with Defendants — to ask that the Court formally refer this case to the mediation program and for a fee waiver for that referral.

In the last few weeks, our firm and the Law Department have discussed setting up a process for mediating a raft of cases in this District arising out of the Summer 2020 protests. That process is running through the Court's mediation office (with the assistance of Robyn Weinstein), and those involved on the Court side have let me know that process has reached the stage where the parties should formally ask for referral — and also ask, at the City's request, that the associated fees be waived.

We are hopeful the mediation will be productive and will help the parties and the Court alike avoid unnecessary litigation. Additionally, in light of that process, the parties jointly ask for an adjournment of discovery deadlines *sine die* so that they may explore settlement. Relatedly, so as to best use the Court's time, we would ask the Court to adjourn for the time being the settlement conference currently calendared for January 31, 2022. *See* Oct. 25, 2022 Minute Order.

As always, we all thank the Court for its attention to this matter.

Respectfully submitted,

/s/

J. Remy Green

*Honorific/Pronouns: Mx., they/their/them*

**COHEN & GREEN P.L.L.C.**

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cc:

All relevant parties by ECF.